

**SUPERIOR COURT
ALLEN COUNTY INDIANA
CAUSE NO. 02D01-0902-PL- 61**

KRISTINE P. PURCELL,
Plaintiff,

VS.

BANK OF AMERICA,
Defendant.

COMPLAINT

Comes now the Plaintiff and for her causes of action against the Defendant alleges and says:

1. Defendant has wrongly accused Plaintiff of owing money on an account.
2. Plaintiff has numerous times requested Defendant for documentation and verification of her connection to such account.
3. Defendant has refused and failed to provide any documentation to Plaintiff.
4. Plaintiff's attorney has numerous times requested Defendant for documentation and verification of Plaintiff's connection to such account.
5. Defendant has refused and failed to provide any documentation to Plaintiff's attorney.
6. Defendant has wrongfully reported to credit agencies Plaintiff's non payment of said account which Plaintiff does not owe.
7. As a direct result of Defendant's actions the Plaintiff has incurred substantial increases in her business accounts interest rates and denials of financing that would not have occurred without Defendant's wrongful actions.
8. Plaintiff has sustained damages of \$20,000.00.
9. Defendant has committed criminal mischief.

10. Plaintiff is entitled to treble damages, costs and attorneys fees.

11. Plaintiff will incur a reasonable attorneys fee of \$20,000.00 as a result of Defendant's actions.

WHEREFORE, the Plaintiff respectfully demands judgment against the Defendant in the sum of \$60,000.00 together with attorneys fees of \$20,000.00 and Court costs, and for all other relief necessary and proper.

Respectfully Submitted,

By: 

R. John Wray, Atty No. 1378-02

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Attorney for Plaintiff